

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

LISA-ATHENA S. ABU HANTASH, in her individual capacity and as mother and natural guardian of JORDAN-ANNETTEE JAZZMIN RICHARDSON, a minor, and JORDAN RICHARDSON, INC., a Virginia Corporation,

Plaintiffs,

-against-

V MODEL MANAGEMENT NEW YORK, INC.
and VNY MODEL MANAGEMENT, LLC,

Defendants.

Docket No.: 07 Civ. 3363 (GBD) (KNF)

NOTICE OF MOTION FOR SUMMARY JUDGMENT OR, IN THE ALTERNATIVE, AN ORDER DIRECTING A SPEEDY HEARING AND ADVANCING THE ACTION ON THE TRIAL CALENDAR PURSUANT TO FED. R. CIV. P. 57

(ORAL ARGUMENT REQUESTED)

PLEASE TAKE NOTICE that upon the Statement of Undisputed Facts, the affirmation of Gavin I. Handwerker, Esq. with exhibits, the affidavit of Plaintiff Lisa-Athena Abu Hantash dated May 24, 2007 with exhibits, the affidavit of Jordan-Annette Jazzmin Richardson dated May 24, 2007 with exhibits and the Memorandum of Law submitted in support of Plaintiff's motion, the Plaintiffs, Lisa-Athena S. Abu Hantash ("Abu Hantash"), in her individual capacity and in her capacity as mother and natural guardian of Jordan-Annette Jazzmin Richardson ("Jordan Richardson"), a minor, and Jordan Richardson, Inc. (the "Company"), by and through their attorneys, NISSENBAUM LAW GROUP, LLC, will move this Court before the Honorable George B. Daniels, United States District Court Judge, at the United States Courthouse for the Southern District of New York, located at 500 Pearl Street, New York, New York, Courtroom 15D, on **Friday, June 22, 2007** at **9:30a.m.**, or at such other date and time as the Court may direct, where counsel may be heard for the entry of an Order:

1. Pursuant to Fed. R. Civ. P. 56, granting summary judgment in favor of Plaintiffs and against Defendants on all causes of action;
2. Pursuant to the Federal Declaratory Act, 28 U.S.C.A. § 2201 et seq., declaring the agreement dated April 22, 2005 between Jordan Richardson and Defendant V Model Management New York, Inc. null and void;
3. In the alternative, rescinding the agreement dated April 22, 2005 between Jordan Richardson and Defendant V Model Management New York, Inc. on the grounds that the agreement is unconscionable;
4. Pursuant to the Federal Declaratory Act, 28 U.S.C.A. § 2201 et seq., declaring that the agreement dated June 19, 2006 between Defendant VNY Model Management, LLC and Plaintiff Company is not a legally binding contract;
5. In the alternative and pursuant to the Federal Declaratory Act, 28 U.S.C.A. § 2201 et seq., declaring the agreement dated June 19, 2006 between Plaintiff Company and Defendant VNY Model Management, LLC is null and void;
6. Granting permanent injunctive relief restraining and enjoining Defendants, their employees, agents, servants and all persons acting under their direction, control or in concert with them from:
 - (a) asserting that any of the aforementioned agreements are enforceable; and,
 - (b) interfering with Plaintiffs' contract relations with any person, firm, company, corporation and/or other entity with regards to Jordan Richardson's modeling career.

7. Requiring each of the Defendants to file with this Court and serve on Plaintiffs within ten (10) days after service of the permanent injunction, a report, in writing, under oath, setting forth in detail the manner and form in which the Defendants have complied with the permanent injunction;

8. Directing Defendants to account to Plaintiffs for all monies received from third persons with regard to Jordan's modeling services and the amount, description and documentation for all of the deductions made by Defendants;

9. In the event the Court denies Plaintiffs' request for summary judgment, in part or in its entirety, ordering a speedy hearing and advancing the above-captioned matter on the trial calendar pursuant to Fed. R. Civ. P. 57;

10. Awarding attorney's fees, costs and disbursements; and

11. Granting such other, further and different relief as to this Court seems just, equitable and proper under the circumstances.

PLEASE TAKE FURTHER NOTICE that in accordance with Local Rule 6.1(b), answering papers, if any, are to be served within ten (10) business days after service of these moving papers.

Dated: New York, New York
May 31, 2007

Yours, etc.,
NISSENBAUM LAW GROUP, LLC

/S/ GAVIN I. HANDWERKER

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